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*Attorneys for Defendants David I. Lustig, individually
and in his capacity as Trustee for The Lustig Family
1990 Trust, and The Lustig Family 1990 Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

-----X

In re:

BERNARD L. MADOFF,

Debtor.

-----X

IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAVID IVAN LUSTIG,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**NOTICE OF MOTION
FOR RECONSIDERATION**

Adv. Pro. No. 10-4554 (SMB)

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IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-4417 (SMB)

v.

THE LUSTIG FAMILY 1990 Trust, et al.,

Defendants.
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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Reconsideration dated June 27, 2017, the Declaration of Bryan Ha in Support of Motion for Reconsideration dated June 27, 2017, the exhibits thereto, and all the pleadings and proceedings heretofore had herein, defendants David I. Lustig, individually and in his capacity as Trustee for The Lustig Family 1990 Trust, and The Lustig Family 1990 Trust, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on a date and at a time to be determined by the Court, for an order: (1) pursuant to Rules 60(b) of the Federal Rules of Civil Procedure, Rules 9024 of the Federal Rules of Bankruptcy Procedure, and the Court's inherent power granting reconsideration of the Order Granting Partial Summary Judgment Striking Affirmative Defenses entered in the above-captioned adversary proceedings on June 13, 2017; (2) staying discovery pending the adjudication of this motion; and (3) granting

such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 27, 2017

Respectfully submitted,

LAW OFFICE OF
RICHARD E. SIGNORELLI

By: /s/ Richard E. Signorelli
/s/ Bryan Ha

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